

Application No. : 10/749,613  
Filed : December 29, 2003

REMARKS

Claims 1-5 and 10 were pending in the application. By this paper, Applicant has amended Claims 1, 3, 5 and 10, and added new Claims 11-30. Accordingly, Claims 1-5 and 10-30 are presented for examination herein.

*Power of Attorney*

Applicant includes herewith a duly executed Power of Attorney compliant with 37 CFR §1.32 authorizing the undersigned to prosecute the present application.

*Allowable Subject Matter*

**Claims 1-2** – The Examiner has stated on Page 4, par. 9 that Claims 1-2 are allowed over the prior art (Applicant assumes that the Examiner meant “allowable” versus “allowed”, since there were still outstanding Section 112 rejections against these claims as discussed subsequently herein). However, Applicant has herein amended Claim 1 to overcome these Section 112 rejections, and hence Claims 1-2 are believed to be in condition for allowance.

*Drawings*

**Figures 1-3** – Figures 1-3 have been amended to include a “Prior Art” Legend in accordance with Examiner’s requirement (par. 3 of the Office Action), and MPEP §608.02(g). Appropriate replacement sheets are submitted herein.

*§112 Rejections and Amendments*

**Claims 1-5** – The Examiner has rejected Claims 1-5 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Specifically, the Examiner has asserted that Claims 1, 3, and 5 each contain insufficient antecedent basis for limitations present in the claims, and Claims 2 and 4 for incorporating the deficiencies from the claims on which they depend. Applicant has herein amended Claim 1, 3, and 5 to provide appropriate antecedent basis. No new matter has been added. Applicant submits that Claims 1-5 meet the requirements of 35 U.S.C. §112, second paragraph, and overcome the Examiner’s rejections.

*§102 Rejections*

**Claim 3** – The Examiner has rejected Claim 3 under 35 U.S.C. §102(b) as being anticipated by Sato et al. (U.S. Patent No. 6,128,318, hereinafter, “Sato”). By this paper, Applicant has amended Claim 3 to include limitations relating to compensating for delays in propagation over the recited distributed bridge. Support for this amendment is replete throughout Applicant’s specification, and can be found specifically, for example, on page 5, par. [0010], lines 7-9. Applicant herein asserts that Sako neither teaches nor suggests “compensating for delays in propagation over the distributed bridge” as specifically claimed by Applicant.

Generally speaking, Sako describes his invention as “a technology which allows a non-bridge node to be the local cycle master while ensuring the network-wide clock synchronization through one or more bridges within the network” (Col. 1, lines 55-59). This is necessary because according to Sako, “it is not always desired or even possible to locate the local cycle masters in the bridges” (Col. 1, lines 54-55). Thus, Sako intends to provide functionality which will enable a cycle master to be located in a non-bridge device instead of being located in a bridge portal.

By contrast, one of Applicant’s major concerns is to achieve synchronization of cycle masters over a distributed bridge, such as e.g., “where the two portals are connected by a long haul or wireless medium” (Par. [0008], lines 1-2). In such cases, “there may be no common clock to be sampled by the cycle timers simultaneously” (Par. [0008], lines 2-3). In many instances, delays associated with propagating signals over the distributed bridge make sampling a common clock impracticable--the IEEE-1394 standard was not designed to function between nodes separated by long distances (*see* Baker referenced *supra*, Col. 2, lines 10-13).

Sako is not at all concerned with this problem. While Sako does obliquely reference a certain bus topology where “[b]ridge portals A and B are interconnected by a wired or wireless interconnect system (sometimes referred to as an ‘internal fabric.’)” (Col. 6, lines 6-9, Fig. 2), there is no indication in Sako that would suggest this fabric is one in which propagation delays are a relevant factor (such, for example, in longhaul communications). Specifically, Sako neither teaches nor suggests “compensating for delays in propagation over the distributed bridge” as claimed by Applicant.

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Thus, Sako does not contain every element mentioned in Applicant's amended Claim 3. For this reason, Applicant asserts that amended Claim 3 is not anticipated by the prior art and thus constitutes allowable subject matter.

5           **Claim 10** – The Examiner has also rejected Claim 10 under 35 U.S.C. §102(b) as being anticipated by Baker et al. (U.S. Patent No. 6,006,286, hereinafter, "Baker"). By this paper, Applicant has amended Claim 10 to include limitations relating to a module adapted to compensate for delays in propagation over the bridge link device. Support for this amendment is replete throughout Applicant's specification, and can be found specifically, for example, on page  
10 5, par. [0010], lines 7-9. Applicant asserts that Baker neither teaches nor suggests "a module adapted to compensate for delays in propagation over the bridge link device," as specifically claimed by Applicant in Claim 10.

          Generally speaking, Baker describes his invention as "a method and system that permits control of the direct memory access engine using a minimal number of input and output accesses  
15 to the data transfer device memory" (Col. 2, lines 45-49). According to Baker, "existing methods for controlling the transfer of data...are not acceptable, because they fail to operate the associated DMA engine in an optimal fashion requiring too many inputs and outputs from memory." (Col 2., lines 27-34).

          Applicant respectfully submits that operating a DMA engine with the optimal number of memory accesses is simply not at all related to achieving synchronization of cycle masters over a distributed bridge "where the two portals are connected by a long haul or wireless medium" (Par. [0008], lines 1-2). Baker is not concerned with this problem. Specifically, Bakers neither teaches nor suggests "a module adapted to compensate for delays in propagation over the bridge link device" as particularly claimed by Applicant.  
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25           Therefore, Baker does not contain every element mentioned in Applicant's amended Claim 10. For this reason, Applicant asserts that amended Claim 10 is not anticipated by the prior art and thus constitutes allowable subject matter.

#### *New Claims*

30           By this paper, Applicant has added new Claims 11-30. Applicant submits that these new claims relate generally to the subject matter of existing Claims 1-10, and hence are properly

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examined herewith. These new claims are also fully supported by the specification as filed, and hence add no new matter.

Moreover, Applicant believes that each of these new claims distinguishes over the art of record, and defines patentable subject matter.

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*Other Remarks*

Applicant hereby specifically reserves all rights of appeal (including those under the Pre-Appeal Pilot Program), as well as the right to prosecute claims of different scope in another continuation or divisional application.

10 Applicant notes that any claim cancellations or additions made herein are made solely for the purposes of more clearly and particularly describing and claiming the invention, and not for purposes of overcoming art or for patentability. The Examiner should infer no (i) adoption of a position with respect to patentability, (ii) change in the Applicant's position with respect to any claim or subject matter of the invention, or (iii) acquiescence in any way to any position taken by  
15 the Examiner, based on such cancellations or additions.

Furthermore, any remarks made with respect to a given claim or claims are limited solely to such claim or claims.

If the Examiner has any questions or comments which may be resolved over the telephone, he is requested to call the undersigned at (858) 675-1670.

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Respectfully submitted,

GAZDZINSKI & ASSOCIATES

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Dated: November 22, 2006

By: 

Robert F. Gazdzinski  
Registration No. 39,990  
11440 West Bernardo Court, Suite 375  
San Diego, CA 92127  
Telephone No.: (858) 675-1670  
Facsimile No.: (858) 675-1674

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